

Message

From: Davis, Kable [Davis.Kable@epa.gov]
Sent: 3/19/2019 2:46:14 PM
To: Fitz, Nancy [Fitz.Nancy@epa.gov]; Maignan, Tawanda [Maignan.Tawanda@epa.gov]
Subject: RE: AAPCO's concerns - the right of SLAs to issue certain 24(c) registrations

Thanks, Nancy!

-----Original Message-----

From: Fitz, Nancy
Sent: Tuesday, March 19, 2019 10:45 AM
To: Davis, Kable <Davis.Kable@epa.gov>; Maignan, Tawanda <Maignan.Tawanda@epa.gov>
Subject: FW: AAPCO's concerns - the right of SLAs to issue certain 24(c) registrations

FYI - This just went out on the AAPCO list serve.

Nancy Fitz
Minor Use Team Leader
Office of Pesticide Programs
U.S. Environmental Protection Agency
phone: 703-305-7385
email: fitz.nancy@epa.gov
web site: <https://www.epa.gov/pesticide-registration/minor-uses-and-grower-resources>

-----Original Message-----

From: Amy Sullivan <aapco.sfireg@gmail.com>
Sent: Tuesday, March 19, 2019 10:34 AM
To: Amy Sullivan <aapco.sfireg@gmail.com>
Subject: FW: AAPCO's concerns - the right of SLAs to issue certain 24(c) registrations

Forwarded by AAPCO

Amy Sullivan
Executive Secretary
AAPCO-SFIREG
406-431-3176
<https://aapco.org>
<https://twitter.com/aapcoexecsec>

On 3/19/19, 10:04 AM, "Roseann Kachadoorian"
<rkachadoorian@oda.state.or.us> wrote:

>Yesterday AAPCO members learned that EPA is now re-evaluating its
>approach to reviewing FIFRA Section 24(c) "requests", and the
>circumstances under which it will exercise its authority to disapprove
>those requests.
>See,
><https://www.epa.gov/pesticide-registration/guidance-fifra-24c-registration>
>s .
>
>
>
>What appears to have initiated high level EPA's interest/concern are the
>Section 24(c) registrations that some states have granted for dicamba
>containing products. EPA specifically highlighted that these state
>registrations are to: add a more restrictive cut-off date, add training
>and certification requirements, or to restrict the use directions by
>limiting the number of treatments permitted by the federal label.
>
>Historically, Section 24(c) registrations have been issued by the State
>Lead Agencies (SLAs) for a wide variety of state determined reasons,
>including: adding additional use sites, pests or application methods;
>changing the timing of applications or conditions; increasing or
>decreasing the number of applications; or adding environmental safety
>restrictions.
>
>Many AAPCO members find it deeply concerning that EPA finds it now

